

**STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-89-E**

IN RE:)	
)	
Duke Energy Carolinas, LLC)	SOUTH CAROLINA DEPARTMENT
2021 Avoided Cost Proceeding Pursuant to)	OF CONSUMER AFFAIRS' FIRST SET
S.C. Code Ann. Section 58-41-20(A))	OF INTERROGATORIES AND
)	REQUEST FOR PRODUCTION TO
)	DUKE ENERGY CAROLINAS, LLC

Pursuant to S.C. Code Ann. Regs. 103-833, the South Carolina Department of Consumer Affairs (the "Department"), by and through its undersigned counsel, hereby submits this First Set of Interrogatories and Request for Production to Duke Energy Carolinas, LLC ("DEC" or "Company"). Pursuant to South Carolina Rule of Civil Procedure 26(e), and Commission regulations, each request is continuing until the time of the hearing such that the Company must promptly transmit to the Department the requested information as it becomes available.

INSTRUCTIONS

1. Responses to these requests should be provided to the undersigned, via email, within twenty (20) days of the date of service.
2. All information should be provided to the undersigned in the format requested and under oath.
3. All responses to the below requests should be labeled using the same numbers as used herein.
4. If the requested information is found in other places or in other exhibits, reference shall not be made to those, but instead, the information should be reproduced and placed in the responses to this request in the appropriate sequence.
5. All documents shall be provided in their native format, e.g., in Word, Excel, or PowerPoint format with all functions, data, and formulas intact.
6. Each request should be reproduced at the beginning of the response thereto.

7. If the response to any Request for Production of Documents is that the information requested is not currently available, please state when the information requested will become available.

8. This request shall be deemed continuing so as to require DEC to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.

9. For any document withheld under a claim of privilege, submit a sworn or certified statement from your counsel or one of your employees in which you identify the document by author, addressee, date, number of pages, and subject matter; specify the nature and basis of the claimed privilege and the paragraph of this demand for documents to which the document is responsive; and identify each person to whom the document or its contents, or any part thereof, has been disclosed.

10. If a refusal to respond to a Request for Production of Documents is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

11. Answer each request on the basis of the entire knowledge of DEC, including information in the possession of DEC or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

12. If any request cannot be answered in full, respond to the extent possible and specify the reasons for DEC's inability to respond.

DEFINITIONS

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "You," "your," and "Company" mean DEC or any of its affiliates, officers, directors, employees, attorneys, or agents.

2. "Application" is defined as the application filed by Duke Energy Carolinas, LLC on April 22, 2021 or as otherwise revised.

3. “Company” and “DEC” are defined as Duke Energy Carolinas, LLC, its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.

4. “Workpapers” and “documents” are defined in the broadest terms and should not be construed as limited to the listed examples, or limited only to items that are currently within your control or custody; include each and every original or copy of words or information generated by printing, typing, longhand, electronic recording, or other process, regardless of the form thereof, and include any kind of writing. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audio tapes, and videotapes. The terms include drafts, revisions or amendments of any of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

5. "Communication(s)" when used in these Requests shall include the transmittal of information by any means, written, oral, electronic or otherwise.

6. When used in referenced to a document, "identify," identity," and "identification" mean to state the type of document (e.g., computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but no long is, in your possession or subject to your control, state what disposition was made of the document, and if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

REQUEST FOR PRODUCTION OF DOCUMENTS

- 1-1 Please provide a copy of all questions or information requests submitted to the Company by other parties, including the Office of Regulatory Staff (“ORS”).
- 1-2 Provide copies of all audit and discovery responses, including responsive documents or materials, already provided by the Company to the ORS or any other party in this docket.

- 1-3 Provide all workpapers and source documents supporting the Company's Application, testimony, and exhibits. Please provide the requested documents in electronic form with any applicable spreadsheet links and formulas intact. Include the source data and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
- 1-4 Please provide all documents referred to by DEC or its attorneys in preparing the Answers to the First Set of Interrogatories served contemporaneously herewith below.
- 1-5 Please provide all reports or other documents, including work papers, prepared by any witness retained by or on behalf of the Company in this case.
- 1-6 Produce copies of all documents and calculations in Word and Excel format with all functions and formulas intact that support or form the basis for the testimony that you intend to present of any person identified in response to Interrogatory No. 1-1 and 1-2, as set forth in the First Set of Interrogatories served contemporaneously herewith below.
- 1-7 Please provide the curriculum vitae or resume showing all qualifications, employment history, previous witness experience, and publications of all witnesses whom the Company intends to use as a witness at the hearing in this case.

INTERROGATORIES

- 1-1 Please provide the names and addresses of any person whom the Company intends to use as a witness at the hearing in this case and identify with specificity the issues to be addressed by such witnesses and indicate whether or not written or recorded statements have been taken from the witnesses and who has possession of such statements.
- 1-2 For each person known to the parties or counsel to be a witness concerning the facts of the case or the Application, set forth either a summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

- 1-3 Do the Application's proposed avoided cost methodology and rates produce any cost shift to, or subsidization by, any customer or class that are not qualifying facilities or do not use power from qualifying facilities? Please explain.

Respectfully submitted this 12th day of May 2021,

S.C. DEPARTMENT OF CONSUMER AFFAIRS



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CERTIFICATE OF SERVICE

I, Roger Hall, hereby certify that the foregoing document was served by electronic mail on all parties at the addresses listed in the official service list for Docket 2021-89-E on May 12, 2021



Roger Hall, Esq.